

EXHIBIT 12

BENJAMIN SHUMATE CORZO vs BROWN UNIVERSITY

September 12, 2023

1

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION
Case No. 1:22-cv-00125

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLANDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

8 BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF
9 TECHNOLOGY, UNIVERSITY OF CHICAGO, THE
10 TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF
11 NEW YORK, CORNELL UNIVERSITY, TRUSTEES OF
12 DARTMOUTH COLLEGE, DUKE UNIVERSITY, EMORY
13 UNIVERSITY, GEORGETOWN UNIVERSITY,
MASSACHUSETTS INSTITUTE OF TECHNOLOGY,
NORTHWESTERN UNIVERSITY, UNIVERSITY OF NOTRE
DAME DU LAC, THE TRUSTEES OF THE UNIVERSITY
OF PENNSYLVANIA, WILLIAM MARSH RICE
UNIVERSITY, VANDERBILT UNIVERSITY, and YALE
UNIVERSITY.

Defendants.

-x

DEPOSITION OF BENJAMIN SHUMATE

September 12, 2023

19 | Reported by:

20 MARY F. BOWMAN, RPR, CRR

21 | JOB NO. J10093116

24 | Confidentiality Designations* * *

BENJAMIN SHUMATE
CORZO vs BROWN UNIVERSITY

September 12, 2023
210

1 Shumate - 9/12/23

2 siblings in college?

3 A. I don't know.

4 Q. Do you have any information sitting
5 here today about what information the Brown
6 financial aid application requested?

7 A. Not that I can remember.

8 Q. Did Brown, in fact, award you
9 financial aid?

10 A. Yes, they did.

11 Q. Can I have Tab 13, please.

12 This will be Shumate Exhibit 18.

13 (Exhibit 18, document, Bates stamped
14 SHUMATE_00001, marked for identification,
15 as of this date.)

16 TECHNICIAN: Can you repeat the tab?

17 MR. KAUFMAN: Yeah, George, this is
18 Tab 13, which will be Shumate Exhibit 18.

19 Q. All right. Mr. Shumate, I'm showing
20 you what has been marked as Shumate Exhibit 18,
21 which appears to me to be a copy of your
22 freshman year financial aid award. It has the
23 Bates stamp SHUMATE_1.

24 Does this appear to you to be a true
25 and accurate copy of your freshman year

BENJAMIN SHUMATE
CORZO vs BROWN UNIVERSITY

September 12, 2023
211

1 Shumate - 9/12/23

2 financial aid award?

3 A. Yes, it does.

4 Q. And I believe you testified earlier
5 that you were able to log into a Brown portal of
6 some kind and obtain some information.

7 Is this one of the documents that
8 you obtained from that portal?

9 A. I don't remember if it was this
10 document specifically. But the documents that I
11 found had some of the same information that's
12 here.

13 Q. And did you use this document or
14 documents of this nature to provide information
15 to your attorneys for preparation of your
16 interrogatory responses?

17 A. Yes, I did.

18 Q. What does this document reflect as
19 the amount that you were awarded in Brown
20 University scholarship for 2015-2016 academic
21 year?

22 A. 33,130 dollars.

23 Q. Do you know whether this was
24 need-based aid or merit aid?

25 A. It was need-based aid.

BENJAMIN SHUMATE
CORZO vs BROWN UNIVERSITY

September 12, 2023
231

1 Shumate - 9/12/23

2 Q. Does this appear to be a true and
3 accurate copy of your junior year financial aid
4 award after the results of the appeal?

5 A. Yes.

6 Q. What does this document reflect as
7 the amount that you were awarded in Brown
8 University scholarship in the 2017-18 academic
9 year?

10 A. 39,050 dollars.

11 Q. And that was an increase of --
12 again, bear with me on math -- I believe 6,450
13 dollars from the 32,600-dollar amount that you
14 cited in the appeal letter, is that correct?

15 A. Yes.

16 Q. Do you have any information about
17 how Brown calculated your original aid award of
18 32,600 dollars?

19 A. No, I don't.

20 Q. Do you have any information about
21 how Brown calculated the additional 6,450
22 dollars that you were awarded through the
23 appeal?

24 A. No, I don't.

25 Q. Do you know if there was any